

1 THE HONORABLE RICARDO S. MARTINEZ

2
3
4
5
6
7 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 CYNTHIA JOHNSON, BRENDA
10 BEZEREDI, JAINE BIALK, on behalf of
themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 THE BOEING COMPANY,

14 Defendant.
15

No. 2:19-cv-00597

STIPULATED MOTION AND ORDER TO
EXTEND STAY TO JUNE 12, 2020

NOTE ON MOTION CALENDAR:
April 7, 2020

16 The parties, by and through the undersigned counsel, hereby submit this Stipulated
17 Motion to Extend Stay. For good cause shown and consistent with the Court's October 1, 2019
18 Stipulated Motion and Order to Stay Case (Dkt. # 24), the parties hereby advise the Court that
19 mediation has been rescheduled to June 3, 2020, and respectfully request that the case and all
20 deadlines and motions continue to be stayed until June 12, 2020.

21 This motion is made for good cause and not for the purpose of delay. The parties
22 scheduled mediation with David A. Rotman for April 2, 2020, but the mediation has been
23 rescheduled to June 3, 2020 due to the COVID-19 pandemic. The parties jointly agree that
24 extending the stay of the case and all deadlines and motions will permit the parties to engage in
25 good faith settlement negotiations and continue to work towards a potential resolution of this
26 matter once they can safely travel to San Francisco, California, to attend mediation in person.

STIPULATED MOTION TO EXTEND
STAY TO JUNE 12, 2020
(No. 2:19-cv-00597) -1

92264493.1

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 For the foregoing reasons, the parties respectfully request that the Court extend the stay
2 in this matter until June 12, 2020, to enable the parties to attend the rescheduled mediation.

3
4 DATED: April 7, 2020

By: s/ Chelsea Dwyer Petersen
Chelsea Dwyer Petersen #33787
William B. Stafford #39849
Charles N. Eberhardt #18019
Stephanie R. Holstein #50802
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: CDPetersen@perkinscoie.com
WStafford@perkinscoie.com
CEberhardt@perkinscoie.com
SHolstein@perkinscoie.com
Attorneys for Defendant

13 By: s/ Molly A. Elkin
Molly A. Elkin, *pro hac vice*
Sarah M. Block, *pro hac vice*
McGillivray Steele Elkin LLP
1101 Vermont Ave. NW, Ste. 1000
Washington, DC 20005
Telephone: 202.833.8855
Email: mae@mselaborlaw.com
Email: smb@mselaborlaw.com

19 David M. Gaba (WA Bar No. 18908)
Compass Law Group
1001 Fourth Avenue, Ste. 3200
Seattle, WA 98154
Telephone: 206.251.5488
Email: davegaba@compasslegal.com

23 Patricia L. Vannoy, *pro hac vice*
Mattson Ricketts Law Firm
134 S 13th Street, Ste. 1200
Lincoln, NE 68508
Telephone: 402.475.8433
Email: bao@mattsonricketts.com

Attorneys for Plaintiffs

1
2
3 **IT IS SO ORDERED.**

4 DATED this 8th day of April, 2020.

5
6 

7 RICARDO S. MARTINEZ
8 CHIEF UNITED STATES DISTRICT JUDGE
9

10 Presented by:

11 /s/ Chelsea Dwyer Petersen

12 Chelsea Dwyer Petersen (WA Bar No. 3378)
13 William B. Stafford (WA Bar No. 39849)
14 Charles N. Eberhardt (WA Bar No. 18019)
15 Stephanie R. Holstein (WA Bar No. 50802)
16 Perkins Coie LLP

17 *Attorneys for Defendant*

18 /s/ Molly A. Elkin

19 Molly A. Elkin (*admitted pro hac vice*)
20 Sarah M. Block (*admitted pro hac vice*)
21 McGillivary Steele Elkin LLP

22 David M. Gaba (WA Bar No. 18908)
23 Compass Law Group, PS Inc.

24 Patricia L. Vannoy (*admitted pro hac vice*)
25 Mattson Ricketts Law Firm

26 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 7, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

David M. Gaba
Compass Law Group
1001 Fourth Avenue, Ste. 3200
Seattle, WA 98154
Telephone: 206.251.5488
Email: davegaba@compasslegal.com
Attorney for Plaintiffs

☐ Via Hand Delivery
☐ Via U.S. Mail, 1st Class, Postage
Prepaid
☐ Via Overnight Courier
☐ Via Facsimile
☒ Via E-Filing

Molly A. Elkin
Sarah M. Block
McGillivray Steele Elkin LLP
1101 Vermont Ave. NW, Ste. 1000
Washington, DC 20005
Telephone: 202.833.8855
Email: mae@mselaborlaw.com
Email: smb@mselaborlaw.com
Attorneys for Plaintiffs

☐ Via Hand Delivery
☐ Via U.S. Mail, 1st Class, Postage
Prepaid
☐ Via Overnight Courier
☐ Via Facsimile
☒ Via E-Filing

Patricia L. Vannoy
Mattson Ricketts Law Firm
134 S 13th Street, Ste. 1200
Lincoln, NE 68508
Telephone: 402.475.8433
Email: bao@mattsonricketts.com
Attorney for Plaintiffs

☐ Via Hand Delivery
☐ Via U.S. Mail, 1st Class, Postage
Prepaid
☐ Via Overnight Courier
☐ Via Facsimile
☒ Via E-Filing

DATED this 7th day of April, 2020 in Seattle, Washington.

s/Mary L. Lyles
Mary L. Lyles, Legal Practice Assistant